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Steven Z. Legon  
Of Counsel

January 21, 2020

Honorable Paul G. Gardephe  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: *United States v. Latifah Abdul-Khaliq*, Docket No. 19-cr-789 (PGG)**

Dear Judge Gardephe:

The purpose of this letter is to respectfully request that the court impose conditions of pretrial release upon the defendant, Latifah Abdul-Khaliq.

On November 7, 2019, Ms. Abdul-Khaliq was arrested in the above-referenced matter in Raleigh, North Carolina, where she resides. Later that same day, she appeared before U.S. Magistrate Judge James E. Gates, in the Eastern District of North Carolina (Western Division), at which time the court issued an Order Setting Conditions of Release as to Latifah Abdul-Khaliq.<sup>1</sup>

Upon signing an Appearance Bond in the amount of \$50,000 (along with two other financially responsible persons) and acknowledging the conditions of her pretrial release, Ms. Abdul Khaliq was released from custody and ordered to appear in the Southern District of New York in the above-referenced matter.<sup>2</sup> On November 15, 2019, Ms. Abdul-Khaliq appeared at the scheduled status conference before your Honor, as ordered, and defense counsel was appointed pursuant to the Criminal Justice Act.

Nevertheless, because this criminal matter is pending in the Southern District of New York, Pretrial Services Officer Dayshawn Bostic has instructed counsel to file an application with the court, requesting that conditions of pretrial release be re-imposed, here, in the Southern District of New York, by your Honor.

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<sup>1</sup> See copy of Order Setting Conditions of Release, attached hereto as Exhibit "A".

<sup>2</sup> Since her release, Ms. Abdul-Khaliq has been subject to the supervision of United States Probation Officer Arthur B. Campbell, in the Eastern District of North Carolina.

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By email to counsel, dated December 17, 2019, Pretrial Services Officer Bostic has recommended that the court impose the following conditions of pretrial release:

1. Personal Recognizance bond signed by two financially responsible persons;
2. Pretrial Services supervision as directed;
3. Surrender all travel documents with no new applications;
4. Travel restricted to SDNY, EDNY, EDNC (with points in between for travel purposes);
5. Refrain from communicating with co-defendants outside the presence of counsel; and
6. Refrain from disseminating personal information of others obtained while employed.

Defense counsel has discussed this matter with the government, and neither defense counsel nor the government have any objections to the foregoing conditions of pretrial release.

Thank you for your Honor's attention to this matter. If there are any questions, or if additional information is required, please contact me at your Honor's convenience.

Respectfully,

*Anthony L. Ricco*

Anthony L. Ricco

cc: A.U.S.A. Louis Pellegrino (By E.C.F.)

cc: A.U.S.A. Mathew Andrews (By E.C.F.)

cc: S.D.N.Y. Pretrial Services Officer Dayshawn Bostic (By Email)

SO ORDERED:

*Paul G. Gardephe*  
Paul G. Gardephe, U.S.D.J.  
Dated: Jan. 31, 2020